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AMO's Response To: The Recycling Council of Ontario Discussion Paper: WHO SHOULD PAY FOR RECYCLING?

Association of Municipalities of Ontario
February 1991

MISSION STATEMENT

AMO unites Ontario's municipalities.

We take pride in promoting, supporting and enhancing strong and effective municipal government.

We provide strategic leadership by:

- developing and effectively promoting responsive quality policy;
- informing and educating governments, the media and the public;
- marketing innovative and beneficial services.

Our elected representatives, municipal officials and association staff form a team which values and respects:

- diversity and local autonomy;
- fairness and equity;
- consultation;
- consensus;
- co-operation.

TABLE OF CONTENTS

PAGE

EXECUTIVE SUMMARY E-1

1 INTRODUCTION 1

2 THE RCO DISCUSSION PAPER 1

2.1 The RCO's Philosophy 2

2.2 The Purpose of the RCO Discussion Paper 2

2.3 Flaws in the Current System 3

2.4 The RCO's Proposal 3

3 AMO'S RESPONSE 4

3.1 Industry Should Be More Involved 5

3.2 Use the "4Rs" to Reduce Waste Volume 6

3.3 Address the Blue Box Problems 7

3.4 Involve Municipalities 8

3.5 Critique of the RCO Proposal 8

4 CONCLUSION 11

Appendix A - Acknowledgments 13

EXECUTIVE SUMMARY

The Recycling Council of Ontario (RCO) released a discussion paper, Who Should Pay For Recycling?, in the summer of 1990. The paper examines some of the marketing problems municipalities have with the recyclable materials collected in the Blue Box system and proposes a new, primarily municipality-driven system for improving prices for these goods. The Association of Municipalities of Ontario (AMO) agrees with some of the ideas in the paper, but not the principle that municipalities should be responsible for solving these problems.

AMO's response begins with a synopsis of the RCO's discussion paper, Who Should Pay For Recycling?. It notes the RCO helped to create the current Blue Box system and that the Ontario Soft Drink Association has supported it because it is much cheaper for it than an expanded deposit system. AMO's response says the RCO's paper focuses only on the Blue Box system's marketing problems and the Blue Box system was based on assumptions, made by the system's founders, which have not proven correct. In particular, the RCO's paper says industry was expected to ensure that the materials collected paid for their own collection, processing and shipping to market. This has not happened and the system's revenues have dropped dramatically.

To rectify this, the RCO has proposed that the industry which has created a product should bear the costs of operating collection and recycling programs for that material. To that end, the RCO proposes a new system so that if a product was not economically recyclable, industry would artificially boost its market price to entice municipalities to collect a material. The cost of recycling a product would then be incorporated into the product's selling price. The RCO proposes that coordination of this system be done through a third party, such as itself or the Association of Municipalities of Ontario. If some materials were still too expensive to collect, the RCO says municipalities would act collectively to refuse to collect, or discontinue collection, of the material until a higher price could be negotiated. The RCO says municipalities would also have to publicize what they were doing so residents would not buy the product.

AMO's response to the RCO's discussion paper, Who Should Pay For Recycling?, is presented in two parts. In the first section, which offers general comments on the proposal, AMO applauds the RCO's proposal to make industry and the private sector responsible for the cost of the Blue Box system. However, it disagrees that industries should not be regulated to ensure this happens. AMO also points out that the RCO's proposal only addresses the third "R" of the "4Rs" waste minimization hierarchy of reduction, reuse, recycling, and recovery of energy-from-waste, in that order. AMO believes a better focus is first on reduction and reuse, and then on recycling.

AMO notes municipalities did not participate in creating the Blue Box system and those who created it assumed recycling markets would develop as needed. That has not happened. For their part, municipalities never believed the material revenues would pay for all, or substantially all, of the program's operational costs and that has proven to be the case. To avoid a similar situation, AMO calls on the provincial government to re-examine this area through a multi-stakeholder group which includes municipalities. Municipalities could then bring their perspective to the table to help address the current problems in this area.

In its specific comments about the RCO's proposal, AMO makes a number of detailed comments. Fifteen points are raised in the section, "Critique of the RCO Proposal". The section includes such points as municipalities should not be responsible for enforcing such a system as proposed by the RCO, AMO does not have the resources to undertake the duties the RCO has proposed, there would be great difficulties in turning the public "on" and "off" of putting materials in the Blue Box, and a more complete model is needed to understand how this system would work.

In conclusion, AMO notes that it appreciates the fact the RCO is examining the problems in the current recycling system and giving municipalities the opportunity to respond to its proposal. However, AMO does not believe the RCO's proposal contains the full answer to the current problems. AMO believes the solution should be found through a multi-stakeholder group with municipalities included in this group.

1 INTRODUCTION

The Recycling Council of Ontario (RCO) released a discussion paper, Who Should Pay For Recycling?, in the summer of 1990. The paper was designed to stimulate discussion and build a consensus so the RCO could present its proposal to the Ontario government with the hope that its ideas would be implemented.

Who Should Pay For Recycling? examines some of the marketing problems municipalities have with the recyclable materials collected in the Blue Box system and proposes a new municipality-driven system for improving the prices for these goods. The Association of Municipalities of Ontario (AMO) agrees with some of the ideas in the paper, but not the principle that municipalities should primarily lead the move to solve these problems. AMO's response to this paper is made with the hope that the system will not be implemented as proposed by the RCO because this would cause more burden for Ontario municipalities.

AMO's response is also made with the knowledge that this paper only addresses the third "R" of the waste minimization hierarchy of reduction, reuse, recycling, and recovery of energy-from-waste. AMO has adopted the "4Rs" waste minimization hierarchy and it reaffirms that reduction and reuse are still preferred to recycling as ways to decrease the solid waste stream. AMO has endorsed the idea presented in this paper only to the extent that the full costs which the private sector would pay for recycling would mean all costs which municipalities incur in this practice. AMO affirms that if recycling is to be pursued, it must be both economically and environmentally less wasteful than reduction.

2 THE RCO DISCUSSION PAPER

This section offers a brief synopsis of the Recycling Council of Ontario's paper, Who Should Pay For Recycling?.

2.1 The RCO's Philosophy

The RCO says in its paper that it played a major role in creating and entrenching the current Blue Box system and recycling policy, and that it still supports this system. On page one of its paper, the RCO says, "We liked it because it meant that the packaging industry had essentially complete freedom (excluding the refillable requirement) to use whatever package it chose, so long as that same industry took direct responsibility for doing whatever it took to ensure that their containers were recycled on a substantive and Province-wide basis."

The RCO says the soft drink industry and its affiliates supported the introduction of the Blue Box program, but it fails to say the soft drink industry association favoured this because it was cheaper for it than an expanded deposit system on refillable containers. On page one of its brochure, Working together to reduce Ontario's Waste, the Ontario Soft Drink Association (OSDA) said, "An expanded deposit system would be almost 5 times more expensive than the Blue Box system."

2.2 The Purpose of the RCO Discussion Paper

In its discussion paper, Who Should Pay For Recycling?, the RCO focuses on only one aspect of solid waste management - the Blue Box system's marketing problems. It says that when the system was developed, assumptions were made that the markets for the collected goods would develop as needed. They have not, and prices paid for recycled Blue Box materials in Ontario have been unstable.

The RCO expects recycling markets to grow and stabilize, and some prices to increase. But on page one of its paper, it says it is addressing the question of unstable markets because the Blue Box system has set a precedent for private and public sector collaboration to develop waste recycling and reduction policies, and the RCO wants "to ensure the results have been as intended, and that the system truly makes the best sense, before commitments to the next round are made."

2.3 Flaws in the Current System

The RCO says on page two of its paper that there is "one type of support that industry was expected to bring to the maintenance of the recycling network that has not been forthcoming, and seems increasingly forgotten - the materials collected were expected to pay for their own collection, processing and shipping to market." On page four, it notes that municipalities, meanwhile, have been "increasingly bound to provide recycling and waste reduction programs of all types, and often at any cost". The result, RCO explains on page four, is that the soft drink industry has taken advantage of this flaw and "the overall percentage of blue box program costs covered by material revenues has dropped dramatically in the past year." The RCO says not only have steel and PET plastic prices dropped, but the steel shipping subsidy has ended, market quality criteria has become stricter without any price increase, and "the loss of the aluminum can to the system has shifted a significant part of the cost burden to the municipal sector."

Because of all this, the RCO concludes that "the competitive market force to push packaging design constantly closer to the Conserver Society is also lost, and we will be forced to bear the cost of collecting virtually any material that passes the technical recyclability test, at increasing municipal cost."

2.4 The RCO's Proposal

On page four of its paper, the RCO says "to the greatest extent possible, the costs of operating collection and recycling programs for any material should be borne by the industry that created that material or product in the first place." To achieve that goal, it proposes a new system be established so that if a material is not economically recyclable, the industry responsible for it would artificially boost its market price enough to entice municipalities to collect the material. The cost of recycling a product would then be incorporated into the product's selling price.

The RCO says society needs a market-driven force to achieve this. On page five of its paper, the RCO says, "Measuring the merit of the packaging by the cost to

recycle it, and making this the force that drives the system is the best approach to take, and it is one that the business community can respond to and work with."

To that end, the RCO says municipalities should use "their right to refuse to collect materials that are too costly" and act in concert "to cease collections of the offending materials." The RCO suggests this be done through a third-party umbrella agency, such as itself or the Association of Municipalities of Ontario. The agency would be responsible for studying the costs and revenues of a representative sample of operating programs across Ontario, and deciding what price would approximate the cost of collecting, processing and shipping that item. If the industry agreed to this price, it would be set and a long-term contract - five or ten-year - would be signed. Under this proposal, the RCO notes on page six that if the costs were largely paid by the producer, "municipalities will then be bound to proceed with the collection of these materials, on industry's behalf." On page seven, it adds the Ministry of the Environment would also "do everything in its broad powers to ensure that municipalities also accept their responsibility."

If an industry's price for a recyclable good was too low, however, the RCO says municipalities would be the ones which would have to collectively approach the industry which produced the waste product and ask for a price increase. If the price was not increased, RCO says municipalities would then have to act collectively - province-wide and not individually - to discontinue collection of the material until a higher price could be negotiated in a long-term contract. The RCO says municipalities should also widely publicize why collection of a material has been discontinued so residents will not buy the product. The Minister of Environment would be responsible for supporting the municipal boycott and, if the waste producer did not improve the economic recyclability of its material, banning the sale of that material in Ontario.

3 AMO'S RESPONSE

This section offers AMO's response to the RCO paper. It begins with generic comments about the paper, then moves to comments about certain aspects of the paper.

3.1 Industry Should Be More Involved

- AMO applauds the RCO's proposal to make industry and the private sector responsible for the cost of the Blue Box system. Municipalities believe industry must be a full partner in solving the waste management crisis. One part of that is having industry pay the full cost of recycling programs, as the RCO is proposing. This is important because when the Blue Box system was established, the system's founders assumed this would happen. It has not, and that now should be corrected so municipal rate-payers do not have to pay for this measure.

  In her first speech, given at the RCO's conference on October 15, 1990, Ontario's Minister of Environment, the Honourable Ruth Grier, also agreed with this philosophy. "Of one thing you can be sure," she said. "I will no longer allow the manufacturers of waste to pass the buck to the public, their municipal governments and the recyclers represented here."

- AMO also agrees with the RCO's statement "that the ability of the private sector to redirect society's energies towards a given goal is a remarkable force". The Minister of Environment also supported this idea in her October 15, 1990 speech. "I still find it hard to believe," she said, "that an industry (the soft drink industry), which has sold a commodity in such vast quantities not just in North America, but around the world, can not sell one simple idea: Buy your soft drinks in a reusable bottle and take the bottle back."

- AMO disagrees with the RCO statement "that to overly bridle or restrict this force would be counterproductive." Industries and commercial enterprises are generally profit-driven, so they will usually chose profit-making over environmental measures when the two are perceived to be in conflict. AMO notes that sometimes this sector must be directed or regulated to take measures, such as protecting the environment, for the benefit of society.

The Minister of Environment also agrees with this philosophy. She has said that after April 1, 1991, she will enforce the refillable soft drink container regulations as an important reuse measure.

- The RCO says on page four of its paper that it "believes that to the greatest extent possible, the costs of operating collection and recycling programs for any material should be borne by the industry that created that material or product in the first place." AMO agrees with the overall philosophy in this sentence, but questions the use of the phrase, "to the greatest extent possible". AMO believes industry should be fully responsible for this area. To begin to determine "the greatest extent possible" would be extremely complicated since each sector would have a different "possible" range.

3.2 Use the "4Rs" to Reduce Waste Volume

- AMO agrees with the RCO that "the endpoint for any policy developed by the Province in the area of waste management must be to reduce the volume of waste generated". However, AMO is concerned that the RCO's paper focuses only on recycling.

  AMO believes waste diversion is best addressed through the "4Rs" waste minimization hierarchy of reduction, reuse, recycling, and recovery of energy-from-waste, in that order. Industry, and all waste producers, should be reducing and reusing waste products before turning to recycling. Thus, AMO believes that while some industries have made some contributions in the recycling area. They should employ reduction and reuse measures before recycling. AMO believes the RCO paper is remiss in not incorporating the first 2Rs as well as recycling in its discussion.

- AMO agrees with the RCO that industry should:

  a) be responsible for its share of waste diversion;

b) provide more long-term financing of the existing system;

c) redesign its products and packaging to achieve better waste management;

d) close the loop on its products; and

e) do more research and development of more efficient collection technologies and systems in order to close the loop.

But, as stated above, AMO believes these should focus not just on recycling, but first on reduction and reuse. AMO also notes that the research and development noted in e) should not just be for systems which would be passed on to municipalities but also for those used by the private sector to reduce the waste it generates.

3.3 Address the Blue Box Problems

On page three of its paper, the RCO says, "It was accepted by the RCO and by the municipal community that the material revenues themselves should pay for all or substantially all of the program operational costs, since this would ensure that free market forces continued to select the most efficiently-recyclable containers." AMO would like to note that, contrary to the RCO's perception, municipalities were under no illusion about this when they began to introduce the Blue Box program. Despite the financial flaws they saw in the program, many municipalities chose to start recycling programs because they wanted to save landfill space. However, from the beginning, they were concerned that the material revenues would not pay for all, or even substantially all, of the Blue Box program's operational costs.

Time has proven this concern to be correct. Poor markets and unstable prices have caused this program to be much more expensive for municipalities than the program's founders anticipated. Some municipalities now find their recycling costs are double their tipping fees. That is why AMO has consistently asked that the province and private sector improve their funding of this

program until it can pay for itself.

3.4 Involve Municipalities

Municipalities did not participate in creating the Blue Box system and assumptions were made at that time that the recycling markets would develop as needed. This has not happened and, as the RCO notes, municipalities have been left with problems selling, storing, and getting an adequate price for marketing the collected recyclables.

AMO appreciates the fact the RCO is examining the problems in the current system and giving municipalities the opportunity to respond to this paper. But, the answers proposed by the RCO's paper do not appear to be the best ones. More should be done on solving the problems in this area and municipalities would like to be part of a multi-stakeholder group which does that. Working with the private sector, the Ontario government, and other interested parties, AMO would be happy to bring to the table the municipal perspective because it is municipalities which handle much of the province's residential solid waste, so it is municipalities which have much of the experience and expertise which can contribute to solving problems in this area.

3.5 Critique of the RCO Proposal

AMO feels that the mechanism which the RCO has proposed for making industry pay is not the proper way to proceed because it will not be effective. The following is a list of AMO's specific concerns with the RCO's proposal:

- Municipalities agree industry should be responsible for financing the Blue Box system, but they do not agree that municipalities should be made responsible for enforcing this system. This would add yet another administrative burden to municipalities and their tax-payers.

- The RCO has not suggested an appropriate co-ordinating body for its system. AMO does not have the financial or staff resources to undertake

this job. The Recycling Council of Ontario is also inappropriate because it helped to create the current troubled system and, in recent years, has consistently identified with many of the private sector's interests. Thus, its neutrality could be called into question by many municipalities.

- Threatening to stop the collection of an item is not the best way to address the Blue Box system's problems. Emphasis should more appropriately be placed on improving the program's funding.

- Municipalities foresee great difficulties in turning the public "on" and "off" of putting materials in the Blue Box. Fostering such behaviour could discredit the program's viability and cause people to end their participation.

- The RCO's suggestion for five to ten-year price contracts between municipalities and industries is designed to address the above problem, cited above. This suggestion could be of concern to municipalities as it has the potential to create new problems for them.

- AMO agrees the Ministry of the Environment (MOE) should be an integral component of whatever method is developed for dealing with the problems and solutions in the waste management area. However, AMO also believes:

  a) the concept of banning an item's sale must be studied further to examine its ramifications before such a measure is adopted;

  b) the MOE should help to close the loop and make the private sector more responsible for the waste it generates. But, working with a multi-stakeholder group which includes municipalities, it must first determine whether regulations are the best way to do this and, if they are, what kind of regulations would be best for this task.

c) the MOE, not municipalities, should publicize the information about any price problems or province-wide bans which might develop.

- AMO agrees that regulations may be necessary to ensure that this waste management area is properly addressed. It has been necessary for the soft drink industry and it may be necessary in other areas as well.

  However, AMO disagrees with the RCO's suggestion that the MOE's policy be modelled on the soft drink regulations. These regulations are a poor model as they are insufficient for helping to solve the waste problem.

- The RCO says in page six of its paper that if industry pays for the costs of the recycling program, municipalities would "be bound to proceed with the collection of these materials, on industry's behalf. On page seven, the RCO says "municipalities must agree" to operate programs to collect recyclable materials. The RCO then adds that if these costs are covered, the MOE "should do everything in its broad powers to ensure that municipalities also accept their responsibility."

  AMO would like the RCO to clarify whether or not "bound to" means "must", such as in mandatory recycling. If it does, this is not acceptable to municipalities, which should have the option to enforce the most effective waste management system for their area. AMO also doubts the MOE can legally "ensure municipalities accept their responsibility" in this area because, under the Municipal Act, most municipalities do not have the statutory authority to do this.

- The RCO suggests municipalities not collect mixed plastics and tetra-pak containers, or any other new material, in the Blue Box until industry agrees to pay most of the cost of collecting, processing and shipping these new materials through the proposed system. AMO disagrees with this suggestion because some municipalities have already begun to collect these materials.

They should be free to continue this collection if they already have a market for that recyclable material.

- AMO notes that some of the items collected in the Blue Box are not financially viable, and the RCO's model does not work for those items which municipalities collect which do not pay for themselves.

- The RCO should also consider that the cost for collecting an item in one municipality or region may be much different than collecting in another municipality or region.

- The RCO says a "neutral, professional, third party auditor" should examine the cost of having each recyclable material from a municipal curbside recycling program collected and delivered to market. AMO does not believe such a neutral auditor exists, and would thus not recommend the establishment of such a system.

- The implications of this system for inter-provincial and international trade have not been spelled out.

- A more complete model is needed to understand how this system would work.

- More information is needed on the implications of imposing yet another tax if this system does not work.

4 CONCLUSION

AMO appreciates the fact the RCO is examining the problems in the current recycling system and giving municipalities the opportunity to respond to this paper. While AMO agrees with some of the ideas proposed in the RCO's paper, Who Should Pay For Recycling?, it has detailed in this response its disagreements with other parts of the RCO's paper. AMO has also noted its concerns and questions about many aspects of the RCO's proposal.

AMO believes the Blue Box system must be revised.

But, before this is done, a multi-stakeholder group should work together to build that new system. That group should consist of representatives from AMO, the private sector, the provincial government, and other interested parties. Municipalities wish to bring their expertise and experience to the table to help solve this problem, and they believe that only by working together can the various sectors find the answers to the current system's problems and thus design a better waste management system.

If, however, a derivation of this RCO model continues to be discussed, AMO wishes the RCO to know that it would like to be involved in those discussions. Whatever is decided will impact municipalities, and municipalities would like to contribute their experience and expertise to those discussions.

Appendix A - Acknowledgments

The Association of Municipalities of Ontario would like to thank the members of its Ad Hoc Waste Management Committee who volunteered their time to produce this document. The members of the team were:

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